UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NORTHEASTERN DIVISION

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UNITED STATES OF AMERICA)	•
)	NO. 3:21-CR-00216
v.)	
)	JUDGE ALETA A. TRAUGER
KENAN LISTER)	

<u>UNITED STATES' MOTION</u> FOR A PROTECTIVE ORDER REGARDING DISCOVERY

Pursuant to Fed. R. Crim. P. 16(d)(1), the United States (the "Government") requests that this Court enter a protective order to protect the Government and the Defendant, and his counsel and agents from claims of improper disclosure of confidential information. In support of this motion, the Government states:

- 1. On September 27, 2021, the defendant was charged with two counts of 18 U.S.C. § 242 (violation of rights under color of law—bodily integrity—and deliberate indifference regarding medical care) and one count of 18 U.S.C. §1519 (obstruction—falsified document) for assaulting an inmate that resulted in serious bodily injury and writing a false incident report.
 - 2. The Defendant was arrested and had his initial appearance on October 5, 2021.
- 3. Much of the discovery in this case includes medical records that contain confidential, private, or personal health information regarding numerous individuals.
- 4. Due to the number of documents that contain personal information or other confidential information, and the number of places within those documents that the confidential information appears, it is not feasible to redact each instance of such information.